

**Monticello Mill Tailings Site
Operable Unit III**

**Monticello Surface- and Ground-Water
Remedial Action Project**

Records Management Plan

August 1993

Work performed under DOE Contract No. DE-AC04-86ID12584 for the U.S. Department of Energy
Grand Junction Projects Office

Chem-Nuclear Geotech, Inc.

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Grand Junction, Colorado

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Monticello Mill Tailings Site

Operable Unit III

Surface- and Ground-Water Remedial Action Project

Records Management Plan

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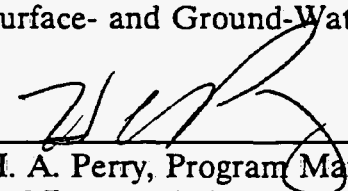
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Introduction

The U.S. Department of Energy (DOE), in conjunction with the U.S. Environmental Protection Agency (EPA), and the State of Utah have entered into a Federal Facility Agreement for the Monticello Mill Tailings Site (MMTS). The Record of Decision (ROD) for the MMTS describes the selected remedial actions for Operable Unit (OU) I (remediation of the millsite) and OU II (remediation of the peripheral properties). The ROD also states when sufficient data are collected, a remedy will be selected for OU III, the Monticello Surface- and Ground-Water Remedial Action Project (MSGRAP). The MSGRAP involves the remediation of surface- and ground-water contamination and source contamination in Upper and Lower Montezuma Canyon.

Chem-Nuclear Geotech, Inc. (Geotech), operating contractor for the DOE Grand Junction Projects Office, is responsible for various project activities which include providing management, administrative, and technical support relating to OU III. One activity is the development and implementation of a project-specific records management program. The goals of the records management program are to achieve the maximum usefulness and protection of Company, DOE, and project-specific information and to minimize the burdens and costs of recordkeeping without reducing the effectiveness of the program.

Records Management Program

The records management program defines systematic and effective controls over each phase of a record's life cycle from initial creation through filing, storing, tracking, and disposing of records. These activities are conducted according DOE Orders 1324.2A, "Records Disposition," 1324.5A, "Records Management Program," and as defined by the National Archives and Records Administration (NARA) within Title 36, Code of Federal Regulations, Chapter XII, Subchapter B, "Records Management."

Responsibilities

Geotech responsibilities for generating, maintaining, and dispositioning of records are shared by Monticello Surface- and Ground-Water Remedial Action Project management, functional organizations, and the Publications and Records Section, as follows:

Manager, Publications and Records:

The Geotech-Publications-and-Records-Manager is responsible for assigning Records Management Coordinators to assist project management in developing the Records Management Plan and for overseeing its implementation. Responsibilities include establishing and maintaining the File Index; staffing and maintaining the central file station; assessing the effectiveness of the records management program and initiating revisions as

necessary; and providing training for implementation of the records management program. The manager is also responsible for reviewing and concurring in all revisions to the File Index, the Records Management procedures implementing or supporting this Plan, and the contents of the Plan itself.

Technical Project Manager, Monticello Surface- and Ground-Water Remedial Action Project:

The Technical Project Manager of the Monticello Surface- and Ground-Water Remedial Action Project (MSGRAP), or designee, is responsible for ensuring the MSGRAP Records Management Plan is implemented by cognizant project staff. The Manager is also responsible for reviewing and concurring in all revisions to the File Index, the applicable procedures generated to implement and/or support this Plan, and the contents of the Plan itself.

Geotech Functional Organization Personnel:

Geotech personnel assigned to or providing support to the MSGRAP are responsible for ensuring required records are generated and kept for their functional organizations and activities as outlined in the File Index. They are responsible for ensuring all records generated are complete, legible, and identified by the appropriate file numbers as listed in the File Index. They are responsible for ensuring the File Index identifies their records and for submitting necessary revisions to Publications and Records for review and incorporation.

Records Coordinators:

Records Coordinators for the central file station are designated by the Publications and Records Manager and for the ancillary file stations by the applicable section or subsection manager. Records Coordinators responsibilities include complying with the requirements of the Records Management Plan; the File Index system; maintaining control, protection, and accountability of records in their custody; and performing those tasks as delegated. They are also responsible for coordinating turnover of records to the central file station for active/inactive storage, as applicable. Records Coordinators must have an overall understanding of the concept of the records management program as described in this Plan, a knowledge of the types of records generated and/or received, and attend the Geotech Records Management training seminars.

Creation of Records

Records:

Records are defined in 44 United States Code, Section 3301, "Disposal of Records- Definition of Records," as including "all books, papers, maps, photographs, or other

documentary materials, regardless of physical form or characteristics, made or received by DOE in pursuance of Federal law or in connection with the transaction of public business, and preserved or appropriate for preservation by the Department as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of the data contained therein."

Factors considered in determining whether a document or other information qualifies as a record are:

- The historic importance of the information as a specific and original source.
- The potential need for the information to support a legal claim or to verify a DOE or Company position.
- The potential value of the information for investigations or audits.
- The value of the information in support of other records.

These factors, in addition to requirements specified in DOE Orders, Federal regulations, and project-specific guidance and requirements, will be used to identify records and generate a list of record categories. The list of record categories forms the basis for the File Index, a focal point of the records management program. The File Index is described later in this Plan.

Records must be complete, clear, and legible. The final storage media may be microfilm, therefore, information must be as reproducible as possible. Handwritten material must be in ink, fully legible, and large enough to remain legible if reduced. Photocopies must be of the highest quality attainable. Color documents should be avoided.

Practices to ensure legibility, accuracy, completeness, and continuity of records are outlined in Section 13 of the *Management Policies Manual*.

Nonrecords:

Nonrecord material includes those classes of documentary or other material which may be disposed of without archival authority such as the following:

- Library or museum material made or acquired for reference or exhibition purposes.
- Extra copies of documents preserved only for convenience of reference on which no action is recorded or taken.
- Stocks of publications or other processed documents that require no action and are not part of a case on which action is taken.

- Routing slips and transmittal sheets adding no information to that contained in the transmitted material, i.e., concurrences, direction on how to proceed or implement.
- Papers of a private or non-official character about an individual's private affairs.

Nonrecord material is not incorporated with records in the file stations. Nonrecords may be identified on the File Index and their locations noted accordingly. Note: Nonrecord material may, at some time, become record material. This occurs when circumstances surrounding the nonrecords change. Should this occur, this material will be reanalyzed as events dictate and the affected material reclassified.

Personal Papers:

Personal papers consist of documents of private or non-official character which pertain only to an individual's personal affairs and must be kept in the offices of project participants since they overlap official responsibilities. Personal papers must be clearly designated as non-official records and will always be filed separately from official records. If matters requiring the transaction of official business are received in private personal correspondence, that portion of such correspondence pertaining to official business will be extracted and made part of the official records.

Use/Active Storage

Regulatory guidelines and various project-specific requirements define levels of protection for some categories of records during their useful lifetimes. Where specific protection requirements are not defined, the consequences of loss or damage to the records are evaluated to determine the appropriate degree of protection, control, and accountability to be imposed.

MSGRAP records shall be stored to prevent damage from moisture or heat and to keep them secure when they are in the possession of an individual outside the file stations. All records maintained in hard-copy form must be firmly attached to binders or placed in folders, envelopes, or boxes for storage in standard file cabinets or within containers on shelving. Provisions for specially processed records (such as magnetic tape, photographs, or negatives) shall be made to protect the records from excessive light, heat, pressure, or electromagnetic fields.

The File Index and file stations are the primary mechanisms ensuring records protection, control, accountability, and retrievability.

File Index:

The File Index (Appendix A) identifies each record and/or record series to be kept for the MSGRAP, their location, and schedules for turning records over for active or inactive storage.

The File Index includes, at a minimum, the file number, file title/subject, file location, schedule for records turnover, and retention schedule. MSGRAP project participants' use of the file numbers identified in the File Index is essential to ensure accurate consolidation of records. The record generator designates the applicable file number(s) on the face of the record in the lower right-hand corner, whenever possible.

The Geotech Publications and Records Section maintains and administers the File Index. Capability to modify index categories is limited to the Publications and Records Section to ensure the integrity of the database. Proposed revisions to the File Index are submitted to Publications and Records for review, concurrence, and input.

File Stations:

File stations established in support of MSGRAP project-specific activities ensure required records can be retrieved quickly, the proper protection and retention of records is implemented, and the disposition of noncurrent records is accomplished.

From the time a record is received in a file station, access is controlled. Records are consolidated at the file stations according to the File Index. When a record is removed from its file location for any reason, that action is noted on an "in/out card," or other system (e.g., the bar-code scanner check out system), and the responsible individual identified. This system provides positive control of the movement and location of records during the period of active use.

Records must be sent to the applicable file station according to the schedules identified on the File Index. Delays in transferring or returning records to a file station must be concurred with by Publications and Records.

Central File Station:

The central file station for MSGRAP records is established and maintained by the Publications and Records Section at the Grand Junction Projects Office. The central file station satisfies applicable records storage, protection, and accessibility requirements for both active and inactive records.

Ancillary File Stations:

As project needs dictate, file stations may be required at a location other than the central file station. Ancillary file stations must meet the requirements for proper storage, protection, and accessibility of records or the records will be turned over to the central file station.

Records Turnover to Central File Station:

At any time during the project's life; when records are no longer required for reference, when space restrictions limit additional records accumulation, or when the requirements for proper storage, protection, and accessibility of records cannot be met, records may be sent to the central file station. Records received from ancillary file stations will be verified and receipt acknowledged. They will be incorporated with related records being maintained at the central file station. Turnover of records to the central file station for active or inactive storage is accomplished using the Records Transfer Transmittal (GJPO 1352).

Authentication of Project Records:

Authentication is a technical review of the contents of the record to ensure the record is complete and correct according to project requirements. The authentication may be in the form of a signature, initials, or statement by the MSGRAP Technical Project Manager. **Note:** Initials are considered valid only if a list of initials and corresponding signatures is maintained. The MSGRAP Technical Project Manager designates those individuals authorized to authenticate project records.

Retention

The retention period for the MSGRAP records is defined in Section XXI of the Federal Facility Agreement. Records are to be retained for a minimum of ten years after termination of the Agreement despite any document retention policy to the contrary. After the ten years has elapsed, DOE must notify the EPA and the State of Utah 45 days in advance of intent to destroy or dispose of the records. Upon request by the EPA or the State of Utah, DOE shall make available such records or documents to either party.

For those records without an approved retention schedule, the required DOE and NARA forms for retention schedule approval will be prepared and submitted. The File Index will indicate "To Be Determined" or TBD until such approval is received.

Inactive Storage

Inactive records will be boxed and transferred to the central file station for inactive (low-cost) storage according to the schedules on the File Index. During the period of inactive storage, records are kept in an appropriate location under the surveillance of Publications and Records until final disposition. The records continue to be retrievable during this period. Transfer of inactive records will be according to the *Geotech Management Policies Manual*, Section 13, "Records Management."

Disposition

Disposition includes removing inactive/noncurrent records from MSGRAP participant's office space to records holding areas (i.e., central file station, Federal Records Center), destroying records as authorized under approved schedules; transferring records to another Federal agency per project-specific requirements; or transferring the records to NARA for permanent retention. Records transfers are authorized by Publications and Records.

Source Documents

Chem-Nuclear Geotech, Inc., *Management Policies Manual*, Section 13, "Records Management."

Chem-Nuclear Geotech, Inc., *Quality Assurance Manual*, Criterion 17, "Records."

Title 36, Code of Federal Regulations, Chapter XII, Subchapter B, "Records Management."

DOE Order 1324.2A, "Records Disposition."

DOE Order 1324.5A, "Records Management Program."

August 26, 1993

Appendix A

Monticello Surface and Ground-Water Remedial Action Project
File Index

<u>File Number</u>	<u>Title/Subject</u>	<u>File Station/ Location</u>	<u>To Central File Station</u>	<u>Retention Category</u>
MSGW 1.0 General Project Files				
MSGW 1.1	Federal Facilities Agreement and Work Plan	PM/GJ	Proj Comp	FFA
MSGW 1.1.1	Responsiveness Summary	PM/GJ	Proj Comp	FFA
MSGW 1.1.2	RI/FS Process	PM/GJ	Proj Comp	FFA
MSGW 1.1.3	Time Schedule	PM/GJ	Proj Comp	FFA
MSGW 1.1.4	ARAR's Submittal	PM/GJ	Proj Comp	FFA
MSGW 1.1.5	FFA Monthly Report	PM/GJ	Proj Comp	FFA
MSGW 1.2	Hazard Ranking System Data/NPL Inclusion Information	PM/GJ	Proj Comp	FFA
MSGW 1.3	Project Plan (The MRAP Project Plan)	PM/GJ	Proj Comp	FFA
MSGW 1.4	Project Management Plan	PM/GJ	Proj Comp	FFA
MSGW 1.5	Records Management Plan	PM/GJ	Proj Comp	FFA
MSGW 1.6	Correspondence "to & from" and FAX's	PM/GJ	Proj Comp	FFA
MSGW 1.6.1	Department of Energy	PM/GJ	Proj Comp	FFA
MSGW 1.6.2	EPA	PM/GJ	Proj Comp	FFA
MSGW 1.6.3	State of Utah	PM/GJ	Proj Comp	FFA
MSGW 1.6.4	Other	PM/GJ	Proj Comp	FFA

File Number	Title/Subject	File Station/ Location	To Central File Station	Retention Category
MSGW 1.6.5	Geotech Internal	PM/GJ	Proj Comp	FFA
MSGW 1.6.6	Meeting/Telephone Conference Logs (Communications Logs)	PM/GJ	Proj Comp	FFA
MSGW 1.6.7	Key Contact List	PM/GJ	Proj Comp	FFA
MSGW 1.7	Cost & Schedule Data (PPS)			
MSGW 1.7.1	Cost and Planning Control Documents	PPS/GJ	Proj Comp	FFA
MSGW 1.7.1.1	Cost Account Authorizations	PPS/GJ	Proj Comp	FFA
MSGW 1.7.1.2	Performance Measurement Baseline	PPS/GJ	Proj Comp	FFA
MSGW 1.7.1.3	Change Control Documentation	PPS/GJ	Proj Comp	FFA
MSGW 1.7.2	Correspondence/Project Specific	PPS/GJ	Proj Comp	FFA
MSGW 1.7.2.1	General Correspondence	PPS/GJ	Proj Comp	FFA
MSGW 1.7.3	Progress Tracking Report (PTS)	PPS/GJ	Proj Comp	FFA
MSGW 1.7.4	WPAS/Five-Year Plan	PPS/GJ	Proj Comp	FFA
MSGW 1.7.4.1	Roadmaps	PPS/GJ	Proj Comp	FFA
MSGW 1.7.4.2	Site-Specific Plans (SSPs)	PPS/GJ	Proj Comp	FFA
MSGW 1.7.4.3	Project Plans	PPS/GJ	Proj Comp	FFA
MSGW 1.7.4.4	A-106	PPS/GJ	Proj Comp	FFA
MSGW 1.7.4.5	Activity Data Sheets	PPS/GJ	Proj Comp	FFA
MSGW 1.7.5	Baseline Schedule	PPS/GJ	Proj Comp	FFA
MSGW 1.7.6	Baseline Cost Estimates	PPS/GJ	Proj Comp	FFA
MSGW 1.8	Cost & Schedule Data (Project)			
MSGW 1.8.1	Monthly Status Reports	PM/GJ	Proj Comp	FFA
MSGW 1.8.2	Weekly	PM/GJ	Proj Comp	FFA
MSGW 1.8.3	Budget	PM/GJ	Proj Comp	FFA
MSGW 1.8.4	Cost Reports	PM/GJ	Proj Comp	FFA
MSGW 1.8.5	Schedule	PM/GJ	Proj Comp	FFA
MSGW 1.8.6	Independent Cost Verification	PM/GJ	Proj Comp	FFA
MSGW 1.8.7	MSA/MP Baseline Plan	PM/GJ	Proj Comp	FFA
MSGW 1.8.8	Baseline Resource Plan	PM/GJ	Proj Comp	FFA
MSGW 1.8.9	302 Report	PM/GJ	Proj Comp	FFA
MSGW 1.8.10	Variance Analysis Report	PM/GJ	Proj Comp	FFA

File Number	Title/Subject	File Station/ Location	To Central File Station	Retention Category
MSGW 1.9	Administrative Record/Information Repository	PM/GJ	Proj Comp	FFA
MSGW 1.10	Value Engineering	PM/GJ	Proj Comp	FFA
MSGW 1.11	Meeting Minutes	PM/GJ	Proj Comp	FFA
MSGW 1.12	NEPA Documentation - Reserved	PM/GJ	Proj Comp	FFA
MSGW 1.13	Environmental Compliance	PM/GJ	Proj Comp	FFA
MSGW 2.0	CERCLA Documentation			
MSGW 2.1	CERCLA Management Plan	PM/GJ	Proj Comp	FFA
MSGW 2.2	RI/FS Work Plan	PM/GJ	Proj Comp	FFA
MSGW 2.2.1	RI/FS Field Sampling Plan	PM/GJ	Proj Comp	FFA
MSGW 2.2.2	RI/FS Quality Assurance Project Plan	PM/GJ	Proj Comp	FFA
MSGW 2.3	RI/FS Report	PM/GJ	Proj Comp	FFA
MSGW 2.4	Engineering Evaluation/Cost Estimate	PM/GJ	DOE Approval	FFA
MSGW 2.5	Proposed Plan	PM/GJ	DOE Approval	FFA
MSGW 2.6	Environmental Assessment	PM/GJ	DOE Approval	FFA
MSGW 2.7	Record of Decision (ROD)	PM/GJ	DOE Approval	FFA
MSGW 2.7.1	ROD Amendments	PM/GJ	DOE Approval	FFA
MSGW 2.8	Responsiveness Summaries	PM/GJ	Proj Comp	FFA
MSGW 2.9	Analytical Reports	Various	Proj Comp	FFA

File Number	Title/Subject	File Station/ Location	To Central File Station	Retention Category
MSGW 3.0 Community Relations				
MSGW 3.1	Community Relations Plan	CR/GJ	Proj Comp	FFA
MSGW 3.1.1	Community Relations Plan Update	CR/GJ	Proj Comp	FFA
MSGW 3.2	Public Meeting Transcripts	CR/GJ	Proj Comp	FFA
MSGW 3.3	Private Interview Meeting Notes	CR/GJ	Proj Comp	FFA
MSGW 3.4	Press Releases/News Clippings	CR/GJ	Proj Comp	FFA
MSGW 3.5	Fact Sheets, Information Updates	CR/GJ	Proj Comp	FFA
MSGW 3.6	Contact Directory/Mailing List	CR/GJ	Proj Comp	FFA
MSGW 3.7	Correspondence/Requests for Information	CR/GJ	Proj Comp	FFA
MSGW 4.0 Health, Safety, & Security				
MSGW 4.1	Health and Safety Plan	HSS/GJ	Proj Comp	FFA
MSGW 4.2	Environmental Monitoring Reports	Various	Complete	FFA
MSGW 4.3	HS&S Project Correspondence	HSS/GJ	Semi-Annual	FFA
MSGW 4.3.1	Memorandums	HSS/GJ	Semi-Annual	FFA
MSGW 4.3.2	Letters	HSS/GJ	Semi-Annual	FFA
MSGW 4.3.3	Telephone Conference Records	HSS/GJ	Semi-Annual	FFA
MSGW 4.3.4	Miscellaneous	HSS/GJ	Semi-Annual	FFA
MSGW 4.4	Radiation Work Permits (RWP)	HSS/GJ	Semi-Annual	FFA
MSGW 4.5	Access Logs (Non-RWP Specific)	HSS/GJ	Semi-Annual	FFA

File Number	Title/Subject	File Station/ Location	To Central File Station	Retention Category
MSGW 4.6	Airborne/Contamination and Access/ Frisking Logs (By RWP #, then date)	HSS/GJ	Semi-Annual	FFA
MSGW 4.7	Airborne Radioparticulate Data Sheets	HSS/GJ	Semi-Annual	FFA
MSGW 4.7.1	Area Specific	HSS/GJ	Semi-Annual	FFA
MSGW 4.7.2	Personnel Specific	HSS/GJ	Semi-Annual	FFA
MSGW 4.8	Analytical Reports	HSS/GJ	Semi-Annual	FFA
MSGW 4.8.1	Airborne Heavy Metal Data Reports	HSS/GJ	Semi-Annual	FFA
MSGW 4.8.2	Airborne/Soil Organic Sampling Report	HSS/GJ	Semi-Annual	FFA
MSGW 4.8.3	Personnel Breathing Zone Sample	HSS/GJ	Semi-Annual	FFA
MSGW 4.8.4	Respirable Dust Sample Data Reports	HSS/GJ	Semi-Annual	FFA
MSGW 4.8.5	Soil Samples/Heavy Metals Lab Reports	HSS/GJ	Semi-Annual	FFA
MSGW 4.8.6	Miscellaneous - Information Varies by Project	HSS/GJ	Semi-Annual	FFA
MSGW 4.9	Contamination Surveys	HSS/GJ	Semi-Annual	FFA
MSGW 4.9.1	Personnel Clothing/Skin Contamination	HSS/GJ	Semi-Annual	FFA
MSGW 4.9.2	Personnel Contamination Log	HSS/GJ	Semi-Annual	FFA
MSGW 4.9.3	Miscellaneous	HSS/GJ	Semi-Annual	FFA
MSGW 4.10	Hazard Assessment	HSS/GJ	Proj Comp	FFA
MSGW 4.10.1	Hazard Analysis	HSS/GJ	Proj Comp	FFA
MSGW 4.10.2	Miscellaneous	HSS/GJ	Proj Comp	FFA
MSGW 4.11	Hazardous Material Access Logs	HSS/GJ	Semi-Annual	FFA
MSGW 4.12	Health and Safety Checklist	HSS/GJ	Semi-Annual	FFA
MSGW 4.13	Heat Stress Surveys	HSS/GJ	Semi-Annual	FFA
MSGW 4.14	Inspections/Investigations	HSS/GJ	Semi-Annual	FFA
MSGW 4.14.1	Event Fact Sheet	HSS/GJ	Semi-Annual	FFA
MSGW 4.14.2	Investigation Reports (Type D,C, etc.)	HSS/GJ	Semi-Annual	FFA

File Number	Title/Subject	File Station/ Location	To Central File Station	Retention Category
MSGW 4.14.3	Occurrence Reports	HSS/GJ	Semi-Annual	FFA
MSGW 4.14.4	Safe Work Permits	HSS/GJ	Semi-Annual	FFA
MSGW 4.14.5	Miscellaneous	HSS/GJ	Semi-Annual	FFA
MSGW 4.15	Log Books	HSS/GJ	Semi-Annual	FFA
MSGW 4.16	Long-Term Performance Checklist	HSS/GJ	Semi-Annual	FFA
MSGW 4.17	Noise Surveys	HSS/GJ	Semi-Annual	FFA
MSGW 4.18	Radon-Daughter Concentration	HSS/GJ	Semi-Annual	FFA
MSGW 4.19	Radioactive Material Shipment Survey Record	HSS/GJ	Semi-Annual	FFA
MSGW 4.20	Radiological Survey Maps	HSS/GJ	Semi-Annual	FFA
MSGW 5.0	Quality Assurance			
MSGW 5.1	QA Program Plan	QA/GJ	Proj Comp	FFA
MSGW 5.2	QA Project Plan	QA/GJ	Proj Comp	FFA
MSGW 5.3	Nonconformance (NCR) Reports	QA/GJ	Proj Comp	FFA
MSGW 6.0	Procurement/Subcontract (Records are to be determined)			
MSGW 7.0	Regulatory Affairs (Records are to be determined)			

Appendix B
Geotech *Management Policies Manual*,
Section 13, "Records Management"

(to be provided upon request)